

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENNETH MAYLE,)	
)	No. 18 CV 6211
Plaintiff,)	
)	Judge Leinenweber
v.)	
)	Magistrate Judge Schenkier
ILLINOIS DEPT. OF NATURAL)	
RESOURCES, et al.,)	
)	
Defendants.)	

IDNR's MOTION TO DISMISS FOR LACK OF JURISDICTION

Defendant ILLINOIS DEPT. OF NATURAL RESOURCES, DIVISION OF PARKS AND RECREATION ("IDNR"), by and through its attorney, KWAME RAOUL, Attorney General of Illinois and pursuant to the Federal Rules of Civil Procedure, 126(b)(1) AND 12(b)(6), moves to dismiss the complaint with prejudice. In further support, Defendant IDNR states as follows:

1. Plaintiff lacks standing to bring suit.
2. Plaintiff has failed to state a claim pursuant to the ADA.
3. Plaintiff has failed to exhaust administrative remedies for any IDHR claim.
4. Plaintiff has failed to state a claim Under the First Amendment or RLUIPA

Defendants contemporaneously file a supporting memorandum.

WHEREFORE, Defendant ILLINOIS DEPT. OF NATURAL RESOURCES, DIVISION OF PARKS AND RECREATION ("IDNR") respectfully requests that the Court grant the motion to dismiss.

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

s/Shirley R. Calloway
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